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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ANGELA CUMMINGS,

Plaintiff,

vs.

UNITED HEALTHCARE SERVICES, INC., a
Delaware Corporation; UHS OF DELAWARE,
INC., a Delaware Corporation; VALLEY
HEALTH SYSTEM, LLC, a Delaware Limited-
Liability Company d/b/a DESERT SPRINGS
HOSPITAL; RAEJOHNE FOSTER, an
individual,

Defendants.

Case No.: 2:13-cv-479-APG-GWF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
AND FOR DEFENDANTS TO RESPOND
TO PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

[FIRST REQUEST]

STIPULATION

It is hereby stipulated by and between the parties, through their respective counsel, that Plaintiff, ANGELA CUMMINGS, (hereinafter referred to as "Plaintiff"), shall have an extension from Thursday, April 30, 2015 to and including Monday, May 11, 2015, in which to file her Response to Defendants' Motion for Summary Judgment filed April 6, 2015. Additionally, the Defendants shall have an extension through and including May 20, 2015 to respond to the Plaintiff's Motion for Partial Summary Judgment filed April 15, 2015. This stipulation is submitted and based upon the following:

1. That Plaintiff's counsel has requested this extension of time and has informed Defendants' counsel that such an extension is necessary because counsel for Plaintiff has been experiencing a heavy workload with numerous court and administrative

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hearings, attending and/or giving testimony at legislative hearings and working on lobbying efforts, written discovery, several depositions, three Early Neutral Evaluation Conferences, one Supreme Court of Nevada settlement conference, two appellate briefs in workers' compensation judicial review matters in state court, and responding to another Motion for Summary Judgment that is now due on Friday, May 1, 2015. Further Plaintiff's Counsel was out of town taking his son to California so that he could attend the Star Wars Celebration in Anaheim April 16-19 which had been planned for almost two years and pre-paid. As a result, during the time since the Defendants filed the motion, Plaintiff's counsel has not had sufficient time to respond to the Motion for Summary Judgment.

2. The Parties are in agreement regarding the Plaintiff's request for an 11 day extension to file her response to the Defendants' Motion for Summary Judgment. In the interests of fairness and equity the Parties agree that the Defendants may have a corresponding 11 day extension, to May 20, 2015, to respond to the Plaintiff's Motion for Partial Summary Judgment filed April 15, 2015.
3. That this request for an extension of time for Plaintiff to file his Response to Defendants' above referenced Motion for Summary Judgment, and the corresponding extension for Defendants to respond to Plaintiff's Motion for Partial Summary Judgment, is made in good faith and not for purpose of delay.

DATED this 30th day of April, 2015.

/s/ James P. Kemp
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/s/ Jamie Chu
 Wendy Medura Krincek, Esq.
 Jamie Chu, Esq.
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 Attorneys for Defendants

ORDER

Good cause appearing, the above stipulation is approved. The Plaintiff shall have through and including May 11, 2015 to file her response to the Defendants' April 6, 2015 Motion for Summary Judgment. The Defendants shall have through and including May 20, 2015 to respond to Plaintiff's Motion for Partial Summary Judgment filed April 15, 2015.

IT IS SO ORDERED

U.S. DISTRICT COURT JUDGEDated: April 30, 2015

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